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October 7, 2020

Via Overnight Mail

National FOIA Office
U.S. Environmental Protection Agency
1200 Pennsylvania NW, Room 5315
Washington, DC 20460

Re: *Liberty Global Logistics v. Bomin Bunker Oil Corp.*
1:19-cv-3842(PAE)(SN)
Our file 14.0036

Dear FOIA Officer:

We are attorneys for Liberty Global Logistics, in the above referenced matter, which is currently pending in the District Court for the Southern District of New York. We are writing pursuant to the Freedom of Information Act, 5 U.S.C. §522 to request the following information.

We are seeking to obtain information related to off-specification and/or contaminated fuel sourced from shore tanks owned by Bomin Bunker Oil Corp. ("Bomin") and stored at its Enterprise and Pelican Island Fuel Facilities in the State of Texas during the time period of January 1, 2018 to January 1, 2019.

Specifically, we would like to obtain copies of all off-spec/contaminated fuel claims that have been reported to the United States Environmental Protection Agency ("EPA") from Bomin at its Enterprise and Pelican Island Fuel Facilities between January 1, 2018, and January 1, 2019. We are seeking all reports made to the EPA of contaminated/off-spec bunker fuels; all EPA investigation reports; all EPA inspection reports; and all EPA laboratory testing analysis and results of bunker fuel from the time period listed above for these respective terminals.

Additionally, we are seeking the same information (as above) for the following entities that are not a part of the pending litigation, but are alleged to have supplied the contaminated/off-spec fuel to the Gulf Coast Region of the United States:

ExxonMobil Oil Corp.

Motiva Enterprises

Allied PetroChemical


British Petroleum Valero Marketing & Supply Company

Trafigura Group Pte. Ltd.

Regarding our inquiry we authorize the EPA to redact all individual personal identifiers.

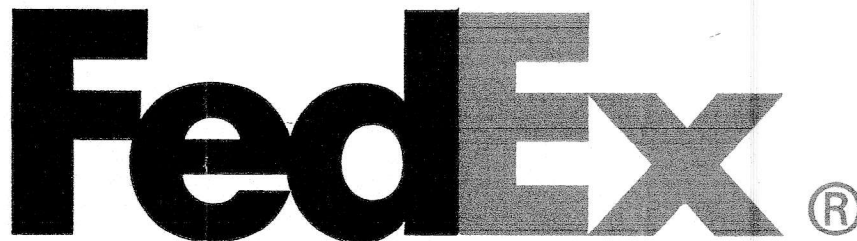
Please send the requested documentation to the signatory at the above address and include an invoice for any searches, copying or certification charges for the requested documentation. We agree to pay all fees associated with this request. If you have any questions or require further information to fulfill this request, please contact me directly at awernicke@hillbetts.com or call (212)589-7522.

Very truly yours,
HILL, BETTS, & NASH LLP.



Adam M. Wernicke

cc: Tulio R. Prieto <TPrieto@cardillocorbett.com>
Gregory O'Neill <goneill@hillbetts.com>
James D. Kleiner <jkleiner@hillbetts.com>



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SHIP DATE: 07OCT20
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US ENVIRONMENTAL PROTECTION AGENCY
1200 PENNSYLVANIA AVENUE NW RM 5315
WASHINGTON DC 20460

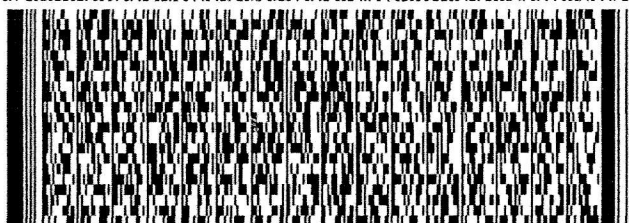
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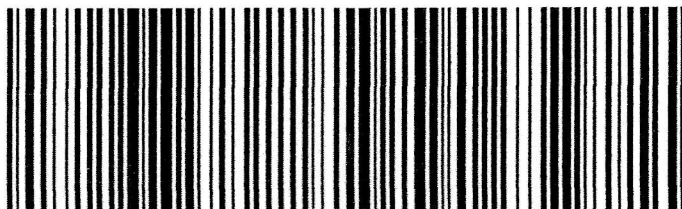
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